

**SOLVENT-CONTAMINATED SHOP TOWELS AND WIPES**

**SBREFA OUTREACH MEETING**

**August 10, 1998**

## **OUTLINE**

- I. Meeting Agenda
- II. Purpose of Meeting
- III. Desired Outcomes of Rule
- IV. Regulatory Options
- V. Questions for Discussion
- VI. Next Steps

## **MEETING AGENDA**

1:00	Introductions	
1:15	Purpose of Meeting and Overview of Issues:  • Problems With the Current Policies and Regulations • Desired Outcomes of the Rule • Regulatory Options Under Evaluation by EPA • Questions for Discussion	
1:45	SBREFEA Participant Discussion	
3:00	BREAK	
3:15	SBREFEA Participant Discussion (Cont.)	
4:50	Next Steps	

## **PURPOSE OF MEETING**

- To obtain feedback from affected entities on EPA options under evaluation for modifying regulations pertaining to solvent-contaminated rags and wipes.

## **PROBLEMS WITH CURRENT POLICIES AND REGULATIONS**

- ➔ The current rules are complex, confusing, and sometimes misleading, such as
  - the use of the Paint Filter Test by some states to define "no free liquids,"
  - the application of the LDR treatment standards in the case of listed solvents no longer exhibiting a characteristic, i.e., F003
- ➔ The potential for non-compliance by the regulated community, such as
  - the "no free liquids" requirement is not always met for reusable wipes,
  - hazardous disposables are sometimes sent to MSWLFs for disposal.
- ➔ The current rules may result in over-regulation of disposable wipes and rags (based upon estimates of potential risk).

## **DESIRED OUTCOMES OF RULE**

- Management standards should be easy to understand and practical to implement.
- Regulations should encourage compliance and be environmentally protective.
- Regulations should clearly identify the point at which solvent-contaminated materials “exit” RCRA jurisdiction.
  - Generators should not have to count shop towels, wipes, and rags managed in accordance with specified conditions as part of the generator’s monthly hazardous waste generation quantity for determining RCRA regulatory status.
  - Wringing and compaction (screen-bottom drums) should not be defined as treatment under RCRA (and thus not subject to permitting requirements).
- Regulations should encourage recycling and/or burning for energy recovery, but also consider land disposal where appropriate.

## REGULATORY OPTIONS

EPA currently is evaluating two regulatory options; a performance-based option and a risk-based option. These options are not mutually exclusive and could be used together.

### PERFORMANCE-BASED OPTION (EPA OPTION 2a):

- Any solvent-contaminated industrial shop towel, wipe or rag is exempt from regulation as a hazardous waste if these materials are sent to:
  - an industrial laundry subject to CWA authority, or
  - a MWC subject to CAA New Source Performance Standards and Emission Guidelines.
- Compliance Conditions:
  - The material must be stored in a closed container from cradle to grave; and
  - The material can contain "no free liquid" when shipped off-site. The "no free liquids" standard would be achieved if, immediately before being shipped off-site, a random sample of shop towels, wipes, or rags removed from different levels in the container can be squeezed, hand wrung, or pass the Paint Filter Test, such that no liquid solvent is released.
  - Failure to meet the required conditions would result in the regulation of wipes as a hazardous waste and receiving facilities subject to either RCRA Part B permitting requirements, or penalties.

## **REGULATORY OPTIONS (cont.)**

*High Risk*

### **RISK-BASED OPTION (EPA OPTION 2b):**

- Solvent-contaminated shop towels, wipes and rags would be exempt from regulation as a hazardous waste and could be disposed in a MSWLF if the amount of listed solvent contained in the materials does not exceed an average of "Y" grams per day.
- Generators would have to certify that they are in compliance with these provisions.
- Certain listed solvents would probably be banned from disposal in a MSWLF under both options (based upon the results of risk analyses).

## **REGULATORY OPTIONS (cont.)**

*Handwritten Note:*  
END of Performance Based Options

### **RISK-BASED OPTION (EPA OPTION 1):**

- Any solvent-contaminated industrial shop towel, wipe, or rag would be exempt from hazardous waste regulations if, when transferred off-site to either an industrial laundry subject to CWA authority, municipal solid waste landfill (MSWLF), or municipal waste combustor (MWC) in compliance with New Source Performance Standards and Emission Guidelines, the solvent portion of the weight of the materials disposed is no greater than "X percent" of the total weight of the total quantity of the materials disposed (i.e., require a solvent removal efficiency). The total amount of solvent contained in these materials is not to exceed "Y grams per day" if transferred off-site to a MSWLF.

*Handwritten Note:*  
Towels

- Wipes would need to be stored on-site in closed containers prior to removing any solvent.
- Generators would have to certify compliance with the performance standards.
- Compliance with this option would probably require centrifuging to achieve the solvent content condition, or conversely, require the use of very little solvent on each wipe.
  - Example: Assume  $X = 10$  percent.
  - Weight of wipe = 10 grams.
- Weight of solvent applied to wipe = 5 grams.
- Therefore, at least 4 grams of solvent would have to be removed to obtain "no greater than" 10 percent threshold.

## **QUESTIONS FOR DISCUSSION**

### **Overarching Questions:**

- Based on your understanding of the problems, do you believe we should move forward with modification to current rules affecting solvent-contaminated shop towels and wipes?
- If so, to what extent does either option meet, or not meet, the desired outcomes (i.e., improve compliance, increase environmental protection, reduce regulatory costs, foster pollution prevention)?
- Do the options under evaluation make sense? Are they clear and understandable?
- How can the options be improved or modified to meet the desired outcomes?
- If not, why not?

## QUESTIONS FOR DISCUSSION (cont.)

### Specific Questions:

- What additional information and guidance would be necessary to ensure clarity and user-friendliness?
- What record keeping or testing requirements are necessary to ensure compliance?
- What special handling requirements, if any, should be required for disposables and reusable wipes when managed off-site (i.e., closed container standards, labeling requirements)?
- At what point should solvent-contaminated shop towels, wipes, and rags exit Subtitle C regulation?
- How should solvent-extraction methods (i.e., centrifuging, wringing) be excluded from RCRA permitting requirements for treatment?
- Should we be specific in defining "no free liquids" or should we provide better guidance to the user-community in how to achieve this requirement?

## **QUESTIONS FOR DISCUSSION (cont.)**

- Should we allow small amounts of solvent-contaminated wipes and towels to be disposed in a landfill?
- How do the standards within the proposed conditional exclusion compare to current management practices? What additional burden may be associated with the proposed regulatory options?
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## **NEXT STEPS**

- EPA requests that written comments from this meeting be submitted by SBREFA outreach members by August 29, 1998.
- EPA will provide a summary of the written comments for SBREFA outreach member review by September 15, 1998.